

**Exhibit A**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20044 & \_\_\_\_

**ORDER APPROVING STIPULATION**

Upon the *Certification of Counsel* (the “Certification”) and the *Stipulation Staying Claims Litigation and Related Discovery With Respect to Proofs of Claim Filed by Alexander Mashinsky, Kristine Meehan, Koala1 LLC, Koala2 LLC and AM Ventures Holdings, Inc.* (the “Stipulation”)<sup>2</sup> entered into between the Debtors, Alexander Mashinsky, Kristine Meehan, Koala1 LLC, Koala2 LLC, and AM Ventures Holdings Inc., attached hereto as Exhibit 1, and this Court having jurisdiction to consider the Certification and approval of the Stipulation pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and it appearing that sufficient notice of the Stipulation has been given under the circumstances; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Stipulation is APPROVED.

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Stipulation or the Certification, as applicable.

2. The failure to specifically include or reference any particular term or provision of the Stipulation in this Order shall not diminish or impair the effectiveness of such term or provision.

3. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Stipulation or the implementation of this Order.

Dated: \_\_\_\_\_  
Wilmington, Delaware

\_\_\_\_\_  
The Honorable John T. Dorsey  
Chief United States Bankruptcy Judge

**Exhibit 1**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**STIPULATION STAYING CLAIMS LITIGATION AND RELATED DISCOVERY  
WITH RESPECT TO PROOFS OF CLAIM FILED BY ALEXANDER MASHINSKY,  
KRISTINE MEEHAN, KOALA1 LLC, KOALA2 LLC, AND  
AM VENTURES HOLDINGS, INC.**

This stipulation (the “Stipulation”) is being entered into by and among (i) Alexander Mashinsky (“Mashinsky”); (ii) Kristine Meehan; (iii) Koala1 LLC; (iv) Koala2 LLC; (v) AM Ventures Holdings Inc. (collectively, the parties listed in the foregoing (i) through (v), the “Claimants”); and (vi) FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors,” and together with the Mashinsky Claimants, each a “Party” and collectively the “Parties”) in the above-captioned cases.

**RECITALS**

**WHEREAS**, the Claimants filed certain proofs of claim against certain of the FTX Debtors in the above-captioned cases that are listed on Exhibit A (the “Proofs of Claim,” and the claims therein the “Claims”);

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd. is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

**WHEREAS**, on or about July 10, 2024, the FTX Debtors filed their *Objection to Certain Proofs of Claim Filed by Alex Mashinsky and Krissy Meehan* [D.I. 20044] (the “Claims Objection”);

**WHEREAS**, on July 11, 2023, the United States of America brought a criminal action against Mashinsky and other defendants in the action styled *United States of America v. Alexander Mashinsky and Roni Cohen-Pavon*, 23 Cr. 347, pending in the United States District Court for the Southern District of New York, which is currently scheduled for trial beginning on January 28, 2025 (the “Mashinsky Criminal Trial”);

**WHEREAS**, the Claimants have requested that the Debtors agree to defer all litigation related to the Proofs of Claim and Claims Objection (collectively, the “Claims Litigation”) until after the Mashinsky Criminal Trial has concluded;

**WHEREAS**, pursuant to the Debtors’ proposed *First Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates* [D.I. 22165] (as may be amended, modified or supplemented from time to time, the “Plan”),<sup>2</sup> the Plan Administrator shall establish, if necessary, a reserve on account of Disputed Claims that may be subsequently Allowed after the Effective Date (the “Disputed Claims Reserve”);

**WHEREAS**, the Parties have engaged in arm’s length negotiations regarding a deferral of all litigation related to the Claims Litigation pending the conclusion of the Mashinsky Criminal Trial;

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** by and among the undersigned counsel for the Parties, as follows:

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Plan.

1. Stay of the Claims Litigation. Subject to the terms of this Stipulation, the Parties hereby agree to stay and hold in abeyance the Claims Litigation and that they will not seek discovery from any other Party or non-party concerning the Proofs of Claim until the conclusion of the Mashinsky Criminal Trial, inclusive of any appeals (the “Stay Period”), or upon further order of the Bankruptcy Court. Upon expiration of the Stay Period, the Parties shall meet and confer in good faith to set a schedule for the Claims Litigation.

2. Agreements with respect to the Disputed Claims Reserve. In consideration for the stay of the Claims Litigation through the Stay Period as set forth above, the Claimants agree (i) that none of the Claims or any claim that any of the Claimants may or could assert against the Debtors shall be included or otherwise accounted for in the Disputed Claims Reserve; and (ii) that they will not object to any relief sought by the Debtors from the Bankruptcy Court in connection with the Disputed Claims Reserve, including establishing the amount of such reserve. For the avoidance of doubt, nothing in this Stipulation shall be construed to limit or waive the right (if any) of the Claimants to seek to recover from the Disputed Claims Reserve pursuant to the Plan in the event any of the Claims becomes an Allowed Claim.

3. General Reservations of Rights. Nothing in this Stipulation (including the recitals incorporated herein) shall constitute an admission on a factual issue or a concession on a legal issue or shall in any way affect or encumber any Party’s claims and defenses against another Party. Nothing in this Stipulation shall affect, encumber, or restrict any Party from seeking discovery from a Party or non-party in connection with the Claims following the conclusion of the Stay Period. The Parties’ rights are fully reserved with respect to the Claims, the Proofs of Claim, and the Claims Objection. For the avoidance of doubt, nothing in this Stipulation shall preclude any party from complying with requests from the Government, cooperating with any government

investigation, or responding to any validly issued subpoenas or other court process, including but not limited to in the Mashinsky Criminal Trial.

4.     Governing Law. This Stipulation shall be governed by, and construed in accordance with, the law of the State of Delaware, without regard to conflict-of-law principles.

5.     Entire Agreement. This Stipulation constitutes the entire agreement among the Parties, and may not be changed, modified or altered in any manner, except in writing, signed by each Party.

6.     Execution in Counterparts. This Stipulation may be executed in one or more counterparts, each of which shall be deemed an original but all of which together shall constitute one and the same instrument. Any signature delivered by a Party electronically shall be deemed an original signature hereto.

[Remainder of page intentionally left blank]

**STIPULATED AND AGREED TO BY:**

Dated: September 20, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew R. Pierce

Adam G. Landis (No. 3407)  
Matthew B. McGuire (No. 4366)  
Kimberly A. Brown (No. 5138)  
Matthew R. Pierce (No. 5946)  
919 Market Street, Suite 1800  
Wilmington, Delaware 19801  
Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
mcguire@lrclaw.com  
brown@lrclaw.com  
pierce@lrclaw.com

-and-

**SULLIVAN & CROMWELL LLP**

Andrew G. Dietderich (admitted *pro hac vice*)  
James L. Bromley (admitted *pro hac vice*)  
Brian D. Glueckstein (admitted *pro hac vice*)  
Benjamin S. Beller (admitted *pro hac vice*)  
125 Broad Street  
New York, NY 10004  
Telephone: (212) 558-4000  
Facsimile: (212) 558-3588  
E-mail: dietdericha@sullcrom.com  
bromleyj@sullcrom.com  
gluecksteinb@sullcrom.com  
bellerb@sullcrom.com

*Counsel for the FTX Debtors and Debtors-in-Possession*

Dated: September 20, 2024  
Uniondale, New York

**RUSKIN MOSCOU FALTISCHEK, P.C.**

/s/ Sheryl P. Giuglano

Sheryl P. Giuglano  
East Tower, 15<sup>th</sup> Floor  
142 RXR Plaza  
Uniondale, NY 11556  
Telephone: (516) 663-6600  
E-mail: sgiuglano@rmfpc.com

*Counsel to Alexander Mashinsky, Koala1, LLC, AM Ventures Holdings, Inc.*

Dated: September 20, 2024  
New York, New York

**KING & SPALDING**

/s/ Leigh Nathanson

Leigh Nathanson  
1185 Avenue of the Americas, 34<sup>th</sup> Floor  
New York, NY 10036  
Telephone: (212) 790-5359  
E-mail: lnathanson@kslaw.com

*Counsel to Kristine Meehan and Koala2, LLC*

**EXHIBIT A****Mashinsky Proofs of Claim<sup>1</sup>****June Individual POCs**

<b>Claim Number</b>	<b>Debtor</b>	<b>Creditor</b>	<b>Filing Date</b>
2314	Alameda Research Ltd	Alex Mashinsky	June 25, 2023
3233	FTX Trading Ltd.	Alex Mashinsky	June 25, 2023
3195	Alameda Research LLC	Alex Mashinsky	June 25, 2023

**September A. Mashinsky POCs**

<b>Claim Number</b>	<b>Debtor</b>	<b>Creditor</b>	<b>Filing Date</b>
85255	Alameda Research LLC	Koala1 LLC	Sep. 29, 2023
85256	FTX Trading Ltd.	Koala1 LLC	Sep. 29, 2023
85257	Alameda Research LLC	AM Ventures Holdings Inc.	Sep. 29, 2023
85258	FTX Trading Ltd.	AM Ventures Holdings Inc.	Sep. 29, 2023

**September K. Meehan Corporate POCs**

<b>Claim Number</b>	<b>Debtor</b>	<b>Creditor</b>	<b>Filing Date</b>
85249	FTX Trading Ltd.	Koala2 LLC	Sep. 29, 2023
85248	Alameda Research LLC	Koala2 LLC	Sep. 29, 2023

**November Individual POCs<sup>2</sup>**

<b>Claim Number</b>	<b>Debtor</b>	<b>Creditor</b>	<b>Filing Date</b>
88339	FTX Trading Ltd.	Alex Mashinsky	Nov. 6, 2023
88338	Alameda Research LLC	Alex Mashinsky	Nov. 6, 2023
88341	Alameda Research LLC	Alex Mashinsky	Nov. 6, 2023

**December A. Mashinsky Corporate POCs<sup>3</sup>**

<b>Claim Number</b>	<b>Debtor</b>	<b>Creditor</b>	<b>Filing Date</b>
89689	FTX Trading Ltd.	Koala1 LLC	Dec. 13, 2023
89699	Alameda Research LLC	Koala1 LLC	Dec. 13, 2023
89697	FTX Trading Ltd.	AM Ventures Holdings Inc.	Dec. 13, 2023
89698	Alameda Research LLC	AM Ventures Holdings Inc.	Dec. 13, 2023

<sup>1</sup> As defined in the Mashinsky Claims Objection.<sup>2</sup> The November Individual POCs purport to amend the June Individual POCs.<sup>3</sup> The December A. Mashinsky Corporate POCs purport to amend the September A. Mashinsky POCs.